

EXHIBIT A

3. I hereby certify that Defendant Khalifa Hifter (“Defendant”) has repeatedly failed to appear for a duly noticed deposition for a total of four times, in violation of Federal Rule of Civil Procedure 30(a)(1).
4. Plaintiffs previously noticed Defendant’s deposition for September 22, 2021; October 13, 2021; November 1, 2021 (subsequently rescheduled to November 9); and May 9, 2022.
5. Defendant has failed to appear at each of the dates that Plaintiffs duly noticed his deposition.
6. I hereby certify that the entirety of Defendant’s discovery productions is published material that is available in the public domain, with the exception of a three-page declaration of Defendant.
7. Defendant’s declaration, produced as part of discovery, asserted his lack of knowledge of or responsibility for the facts alleged by Plaintiffs.
8. I have a good faith belief that Defendant does not intend to produce further discovery in this case.
9. I have a good faith belief that Defendant does not intend to be deposed in this case.

I declare under the penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated the 20th day of May 2022, at Washington D.C., the United States.

/s/ Joseph G. Grasso
Joseph G. Grasso